#### COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION



In the Matter of:

APPLICATION OF JACKSON PURCHASE	)
ENERGY CORPORATION FOR	)
ADJUSTMENTS IN EXISTING CABLE	)CASE NO. 2004-00319
TELEVISION ATTACHMENT TARIFF	)

# TO (1) REQUEST FOR PRODUCTION OF DOCUMENTS AND (2) INFORMATION AND DATA REUESTS OF BALLARD RURAL TELEPHONE COOPERATIVE CORPORATION, INC.

DORSEY, KING, GRAY, NORMENT & HOPGOOD 318 Second Street
Henderson, Kentucky 42420
Telephone (270) 826-3965
Telefax (270) 826-6672
Attorneys for Jackson Purchase Energy Corporation

By / / / / Frank N. King, Jr.

I hereby certify that this Response has been served upon Gardner F. Gillespie, Hogan & Harston, L.L.P., 555 Thirteenth Street, Washington, D.C. 20004-1109, and Frank F. Chuppe, Wyatt, Tarrant & Combs, LLP, 500 West Jefferson Street, Suite 2600, Louisville, KY 40202, attorneys for Kentucky Cable Telecommunications Association; and John E. Selent and Holly C. Wallace, Dinsmore & Shohl, LLP, 1400 PNC Plaza, 500 West Jefferson Street, Louisville, KY 40202, attorneys for Ballard Rural Telephone Cooperative Corporation, Inc., by sending a true and correct copy of same by overnight delivery via FedEx on this 2<sup>nd</sup> day of August, 2005.

counsel for Jackson Purchase Energy Corporation



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REQUEST NO. 1) Please produce any and all documents which
evidence, relate, or refer to line items 3, 4, 5, or 6 in Exhibit 3 to Richard Sherrill's
testimony filed with Jackson Purchase's application in the above-referenced
matter on or about November 15, 2004.
RESPONSE) As explained in the Introductory Comment of the
Amended Application, JPEC is now using the rate of return in its last general rate
case that had a rate of return stipulated in the order. Therefore the requested
documents are irrelevant and JPEC objects to production on this ground.
**************************************
WITNESS) Richard Sherrill.

Item 1 Page 1 of 1

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3	REQUEST NO. 2) Please produce any and all documents which
4	evidence, relate, or refer to the return on investment permitted in Jackson
5	Purchase's last general rate case.
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8	RESPONSE) Please see JPEC's Response to First Data Request of
9	Commission Staff, Item 4, page 2 of 2.
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12	WITNESS) Richard Sherrill and Charles Williamson.
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Item 2 Page 1 of 1

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3	REQUEST NO. 3) Please produce any and all documents which
4	evidence, relate, or refer to the embedded class cost of service study filed by
5	Jackson Purchase with its last general rate case.
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8	RESPONSE) JPEC's last general rate case was Case No. 97-224.
9	Documents filed in that case are irrelevant to the issues in the instant case and
0	JPEC objects to production on that ground.
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3	WITNESS) Kelly Nuckols and Richard Sherrill.
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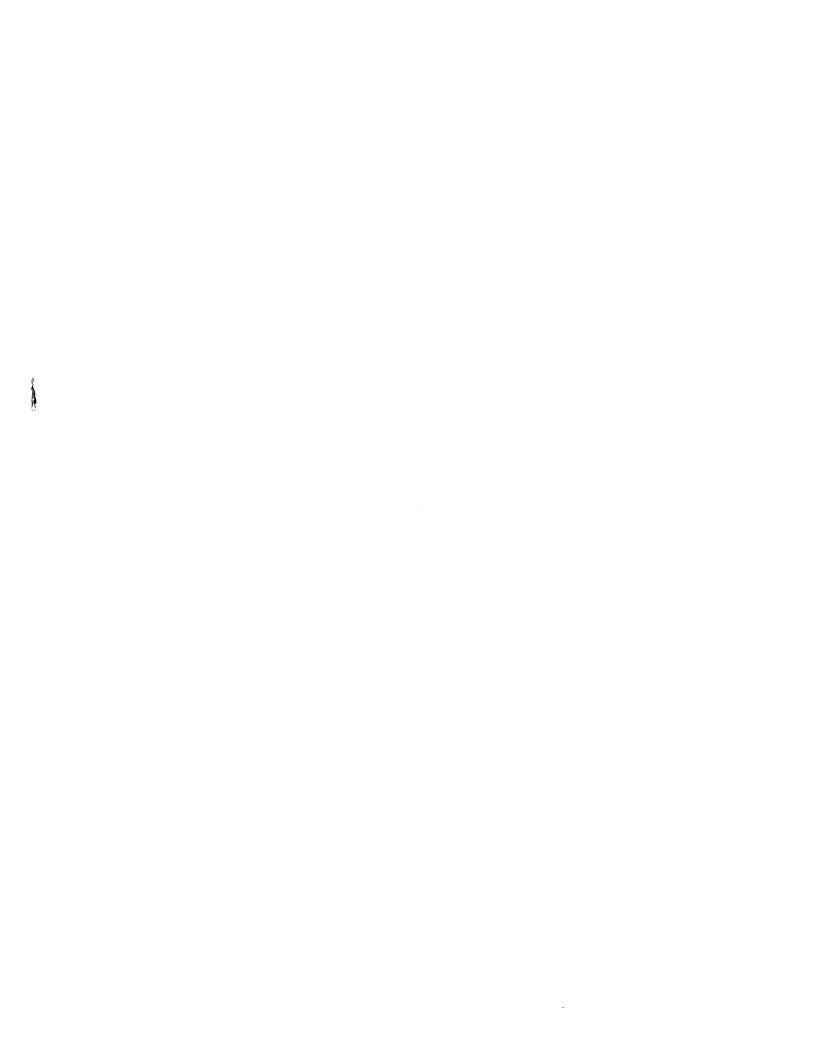
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3	REQUEST NO. 4) Please produce any and all documents which
4	evidence, relate, or refer to the 18% depreciated pole plant claimed by Jackson
5	Purchase.
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7	TOTAL DECIMENTS
8	RESPONSE) Please see Amended Application. JPEC is now using
9	the net value of its entire utility plant in calculating the rate of return, so pole plant
0	depreciation is irrelevant and JPEC objects to production on this ground.
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13	WITNESS) Richard Sherrill.
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3	REQUEST NO. 5) Please produce any and all documents which
4	evidence, relate, or refer to the multiplier of .95 used to adjust pole account values
5	as identified in Exhibit 2 to Jackson Purchase's application.
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7	The state of the s
8	RESPONSE) Please see Amended Application. JPEC is now using
9	the multiplier of .85, so documents with this information are irrelevant and JPEC
0	objects to production on this ground.
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3	WITNESS) Richard Sherrill.
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2	REQUEST NO. 6) Please produce any and all documents which
3 4	evidence, relate, or refer to the \$33.08 grounding costs added to the bare pole costs
5	as identified in Exhibit 2 to Jackson Purchase's application.
6	as identified in 2. most 2 to the second of
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8	RESPONSE) Please see Amended Application. JPEC is now using
9	ground cost of \$12.50 so documents with this information are irrelevant and JPEC
0	objects to production on this ground.
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3	WITNESS) Richard Sherrill.
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3	REQUEST NO. 7) Please produce any and all documents,
4	including but not limited to worksheets, which evidence, relate, or refer to Jackson
5	Purchase's proposed pole attachment and anchor rates.
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8	<b>RESPONSE</b> ) See Amendment Exhibit 2 to Amended Application.
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11	WITNESS) Richard Sherrill.
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Item 7 Page 1 of 1



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3	REQUEST NO. 8) Please produce any and all documents which
4	evidence, relate, or refer to Jackson Purchase's accumulated depreciation reserve
5	for utility plant as of the year end 2003.
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8	RESPONSE) This information is shown on the excerpt of JPEC's
9	2003 Annual Report attached as Item 2, Page 2 of 2 of JPEC's Response to
10	KCTA's First Information and Data Request.
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13	WITNESS) Richard Sherrill.
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2	THOUSE NO. D. D. The standard and all documents which
3	REQUEST NO. 9) Please produce any and all documents which
4	evidence, relate, or refer to Jackson Purchase's accumulated depreciation reserve
5	for Account 364 including, but not limited to, any documents used in calculating
6	the accumulated depreciation for reserve account 364.
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8	1 / 1 lauraiation reconve for
9	<b>RESPONSE</b> ) The separate accumulated depreciation reserve for
0	Account 364 is now irrelevant because JPEC is using the net value of its entire
1	utility plant in calculating the rate of return, and JPEC objects to production on
12	this ground. However, accumulated depreciation reserve for Account 364 is
13	included in the information for Account No. 108.664 shown in Sherrill Exhibit 2
14	of the original application.
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17	WITNESS) Richard Sherrill.
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3	REQUEST NO. 10) Please produce any and all documents which
4	evidence, relate, or refer to Jackson Purchase's continuing property records for
5	Accounts 364 and 365 in their entirety, for year end 2003, and for each subaccount
6	reflected indicate all items included in such subaccount. (Please provide complete
7	copies of both the print out for "plant distribution" 12/31/03 and CPR Master File
8	data as of year end 2003.)
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11	<b>RESPONSE</b> ) Please see JPEC's Response to Item 5 of KCTA's
12	First Information and Data Request.
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15	WITNESS) Richard Sherrill and Charles Williamson.
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Item 10 Page 1 of 1

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3	RF	EQUEST NO. 11)	Please provide a detailed explanation of
4		used to derive Jacksor	Purchase's proposed poles attachment and
5	anchor rates.		
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7	TO T	ECDONICE) C A	Amont Exhibit 2 to Amonded Application
8		ESPONSE) See Amei	ndment Exhibit 2 to Amended Application.
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3	REQUEST NO. 12) Please provide a detailed explanation of
4	Jackson Purchase's accumulated depreciation reserve for utility plant, as of year
5	end 2003.
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7	TOTAL TIME
8	RESPONSE) See JPEC's Response to Item 2 of KCTA's Firs
9	Information and Data Request.
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2	WITNESS) Richard Sherrill and Charles Williamson.
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Item 12 Page 1 of 1

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3	REQUEST NO. 13) Mr. Sherrill's prepared testimony
4	Response 6, states that the "net book value of the entire pole plant" is
5	\$20,669,711. Please provide a detailed explanation of Jackson Purchase's
6	accumulated depreciation reserve for Account 364 and the calculations used to
7	derive the amount identified.
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0	RESPONSE) See JPEC's Response to Item 3 of KCTA's Firs
1	Information and Data Request.
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4	WITNESS) Richard Sherrill and Charles Williamson.
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	Item 13

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2	REOUEST NO. 14) Does Jackson Purchase contend that
3	
4	Ballard Rural attaches to Jackson Purchase's grounding system on every pole?
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6	RESPONSE) Ballard Rural's attachments to JPEC's grounding
7	RESPONSE) Ballard Rular's attachments to 31 EC's grounding
8	system are irrelevant to the issues in this case and JPEC objects accordingly.
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0	WITNESS) Kelly Nuckols and Richard Sherrill.
1	WITHESS) Kerry Nuckois and Remard Sherrin.
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3	<b>REQUEST NO. 15)</b> If the answer to data request 14 is affirmative,
4	please provide all evidence that demonstrates that Ballard Rural actually attaches
5	to Jackson Purchase's grounding system on every pole.
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7	RESPONSE) Not applicable. See response to Request No. 14.
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11	WITNESS) Kelly Nuckols and Richard Sherrill.
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3	REQUEST NO. 16) Please provide a detailed explanation of
4	Jackson Purchase's practices regarding placement of grounds on its distribution
5	system.
6	
7	RESPONSE) See JPEC's Response to Item 10 of KCTA's First
8	Information and Data Request.
9	Information and Data Request.
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2	REQUEST NO. 17) Please provide a detailed comparison of the
3	rate of return used in the carrying charge calculation, as identified in Exhibit 3 to
4	Richard Sherrill's testimony and Exhibit 2 to Jackson Purchase's application, and
5	the return on investment permitted in Jackson Purchase's last general rate case.
6 7	the return on investment permitted in vacable 1 az visas c 1 az visas c
8	
9	RESPONSE) Please see Amended Application. JPEC is now using
10	the rate of return in its last general rate case in which the order stipulated a rate of
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14	WITNESS) Richard Sherrill.
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3	REQUEST NO. 18) Please provide a detailed explanation of how
4	Jackson Purchase calculated the figure of 18% depreciated pole plant claimed by
5	Jackson Purchase.
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7	RESPONSE) See JPEC's above response to Request No. 4.
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11	WITNESS) Richard Sherrill.
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3	REQUEST NO. 19) Please provide a detailed explanation of why
4	Jackson Purchase uses a multiplier of .95 as identified in Exhibit 2 to its
5	application instead of .85 in accordance with Administrative Case No. 251.
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7	RESPONSE) See JPEC's above response to Request No. 5.
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10 11	WITNESS) Richard Sherrill.
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2	The virginia of which is a detailed explanation of why
3	REQUEST NO. 20 Please provide a detailed explanation of why
4	Jackson Purchase adds grounding costs to its bare pole costs as identified in
5	Exhibit 2 of its application instead of subtracting ground costs from bare pole
6	costs in accordance with Administrative Case No. 251.
7 8	
9	RESPONSE) Please see Amended Application. JPEC is proposing
0	separate rates for grounds. Exhibit 2 of original Application is now inapplicable.
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3	WITNESS) Richard Sherrill.
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3	REQUEST NO. 21 Please provide a detailed explanation of how
4	Jackson Purchase calculated ground costs in the amount of \$33.08 as identified in
5	Exhibit 2 to Jackson Purchase's application.
6	
7	PROPONOE: Plane and Amended Application IPEC is now using
8	RESPONSE) Please see Amended Application. JPEC is now using
9	cost of \$12.50 per ground. Exhibit 2 of original Application is now inapplicable.
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2	WITNESS) Richard Sherrill.
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2	expression are an Di in the in thick account ground costs
3	REQUEST NO. 22) Please identify in which account ground costs
4	are now included if they are no longer included in Jackson Purchase's pole
5	accounts as they were in 1984, and please provide the detail and entries made or
6	the books to transfer ground costs originally included in pole accounts to the
7	accounts in which ground costs are now contained.
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9	RESPONSE) JPEC has always shown ground costs in Accoun
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12	WITNIECO Dishard Charrill
13	WITNESS) Richard Sherrill.
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3	REQUEST NO. 23) Please identify in detail each time Jackson
4	Purchase deviated from the methodology established in Administrative Case No.
5	251 when calculating the proposed cable television attachment tariff rates in its
6	application.
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9	RESPONSE) Please see Amended Application. JPEC is not
0	deviating from Administrative Case No. 251 methodology in its calculations.
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13	WITNESS) Richard Sherrill.
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3	REQUEST NO. 24) With regard to Exhibit 2 to Richard Sherrill's
4	testimony, please indicate all RUS "electric plant in service" accounts associated
5	with Accounts 108.600 - 108.673. Among other things, indicate which of the
6	108.600 series of accounts contain accumulated depreciation associated with each
7	of Accounts 362, 363, 364, 365, 366, 367, 368, 369 and 370.
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9	DECDONICE) Con IDEC's response to Item A of KCTA's Firs
0	RESPONSE) See JPEC's response to Item 4 of KCTA's Firs
1	Information and Data Request.
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3	REQUEST NO. 25) Please explain fully Jackson Purchase's
4	procedures for recording retirements in Accounts 364 and 365, and explain why
5	no retirements are reflected in the "Plant Distribution" information other than in
6	2003.
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8	RESPONSE) See JPEC's Response to Item 6 of KCTA's First
9	Information and Data Request.
0	Information and Data Request.
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3	REQUEST NO. 26) Please describe fully all equipment and
4	facilities that are contained in Account 365.261.
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7	RESPONSE) See JPEC's Response to Item 7 of KCTA's First
8	Information and Data Request.
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11	WITNESS) Richard Sherrill.
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3	REQUEST NO. 27) Please identify when Jackson Purchase had its
4	last general rate case, and please identify the corresponding case number assigned
5	by the Public Service Commission of the Commonwealth of Kentucky.
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8	RESPONSE) JPEC's last general rate case was in 1997 and was
9	Case No. 97-224.
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12	WITNESS) Richard Sherrill.
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